



April 29, 1998

Via Facsimile and UPS Overnight Mail
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Ms. Bri Bill
Community Involvement Coordinator
Office of Public Affairs (P-19J)
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

*date should
Read April 29,
1999*

Ms. Gwen Massenburg
Remedial Project Manager
Office of Superfund (SR 6J)
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Ms. Bill and Ms. Massenburg:

The purpose of this letter is to comment on the proposed plan for cleanup of the former Master Metals site, located at 2550 West Third Street in Cleveland, Ohio.

As you know, we have been in discussion with a number of parties involved with the Master Metal's property to determine if it might represent a feasible alternative for relocation of our Cleveland facility. For the Master Metal's property to represent a feasible alternative, site conditions after the cleanup would have to **allow for the cost effective** construction of building space for the storage and processing of materials, a **tank farm** for storage of bulk liquids, installation of utilities, and areas for the movement of trucks and other heavy vehicles. Thus, site conditions must allow for the installation of building and foundation footers, floors, paved areas, etc. Our review of your proposed plan for the Master Metal's site has left us with questions regarding how the plan would accommodate future site development.

While we understand that there are many **factors** that must be carefully considered in arriving at a final cleanup plan for this site, we believe that any such plan should give priority to possible future development in order that the site can be returned to productive use. Specifically, we ~~are~~ that the following comments should be addressed or included in the final cleanup plan ~~and~~ the barriers to future development:

- The proposed plan recommends the consolidation of off-site **contaminated soil** site and the installation of a geotextile barrier over the **contaminated soils** to prevent any intermingling or the release of the **contaminated materials**. We question if off-site contaminated soils should be disposed of on-site as this adds

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complexity of the cleanup and greatly increases the complexity and potential cost for future development. Construction of most any structure, installation of utilities, or other site improvement would be very difficult and expensive if the contaminated soils were placed on-site and covered with a geotextile barrier. We feel that there may be other solutions to on-site disposal of off-site contaminated materials that will achieve the desired result yet still allow for future site development.

- The proposed plan recommends that the site either be backfilled to grade and then covered with two feet of clean fill soil and clay and vegetation planted or sealed with asphalt, concrete or a concrete sealer. All areas where the contaminated soils from off-site are deposited and or the concrete is deteriorating will also be covered with a geotextile liner. We feel that this alternative would effectively deter any future development of this site as once the proposed cap is complete it will be very difficult and extremely costly to install or construct virtually anything on this site. In particular, the installation of anything that either disturbs or compromises this cap, such as a sewer, water line, foundation, roadbed, etc. would be cost prohibitive. In addition, once the cap is complete, it will be virtually impossible to construct anything on top of the cap. We feel there are other feasible alternatives to a clay and soil cap with vegetation that could accommodate the same objectives yet still permit future development on this site.

The above comments are intended to focus on what we believe are critical portions of the proposed clean-up plan if the site is to be returned to productive use. In addition to the above, we feel that deed restrictions, utilities, and a number of other issues that may impact future development should also be addressed in the final clean-up and operations and maintenance plan for the Master Metals site, and we would be glad to discuss these comments in greater detail as you prepare the final plan for this site.

We look forward to continuing to work with USEPA and the other interested parties to find a cleanup plan for this site that protects human health and the environment and puts the property back into productive use.

Very truly yours,

TBN HOLDINGS INC.



Charles E. Kulinski

Sr. Vice President, Operations and Environmental Affairs